## REMARKS

This is intended as a full and complete response to the Office Action dated February 12, 2004, having a shortened statutory period for response set to expire on May 12, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-23 are pending in the application. Claims 24-26 have been added. Claims 1-26 remain pending following entry of this response. Claims 1, 3, 6, 10-13, 15, 18-20, 22 and 23 have been amended to more clearly recite features of the claimed invention. Applicants submit that no new matter has been introduced by the amendment.

Claim 22 is objected to because of informalities. Claim 22 has been amended to correct grammatical errors. Applicants submit that the objection has been obviated.

Claims 1-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Oyamada et al.* (U.S. 5,617,333, hereinafter *Oyamada*) and *Ding* (U.S. 5,883,823). The Examiner takes the position that it would have been obvious to one skilled in the art at the time of the invention was made to modify the image processing system of *Oyamada* to use the odd/even storage means disclosed in *Ding*. Applicants respectfully traverse this rejection.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. § 103(a), then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

*Oyamada* discloses an image data transmission system having a transmitter section which partitions an image data into a predetermined number of data blocks and a receiving section which detects and corrects transmission-caused errors in the received data blocks. *Ding* is directed at improving the efficiency of computing inverse discrete cosine transforms utilized in video applications and discloses a system and method for computing inverse discrete cosine transforms in which an array of

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coefficients is divided into two groups wherein a first algorithm is applied to coefficients in one of the two groups using even/odd ind xing.

Applicants contend that the references cited by the Examiner do not teach, show or suggest all of the claim limitations. In particular, the references do not teach, show or suggest storing multimedia data utilizing an odd/even index sequencing of a matrix representing the multimedia data and/or reconstructing the matrix utilizing odd/even index sequencing. Although *Oyamada* discloses partitioning data into logical blocks and *Ding* discloses discrete cosine transform coefficients in a matrix, neither reference teach, show or suggest storing the data in a storage device utilizing an odd/even index sequencing of a matrix representing the multimedia data. More specifically, although *Ding* utilizes a partial odd/even indexing of a coefficient matrix in computing inverse discrete cosine transforms, *Ding* does not teach, show or suggest storing the multimedia data as an i by j matrix in a data storage device utilizing odd/even index sequencing of the i by j matrix. The references cited by the Examiner, at best, suggest only a system in which an odd/even indexing is utilized in computing inverse discrete cosine transforms for data blocks which already have been partitioned, transmitted and received. Applicants submit that the references cited by the Examiner, either alone or in combination, do not teach, show or suggest storing an i by j matrix in a data storage device utilizing odd/even index sequencing of the i by j matrix, as claimed in the independent claims 1, 12 and 19.

Furthermore, Applicants submit that the references cited by the Examiner, either alone or in combination, do not teach, show or suggest retrieving the stored matrix data and reconstructing the i by j matrix utilizing odd/even index sequencing of the retrieved data. Therefore, Applicants submit that claims 24-26 and claims dependent thereon are patentable over *Oyamada* and *Ding* and respectfully requests withdrawal of the rejection.
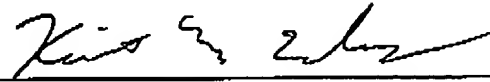
The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action. Having addressed all issu s set out in the office action,

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Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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